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*Counsel for the Former Officers*

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

In re:	§	
	§	Chapter 7
Goodman Networks, Inc.,	§	
	§	Case No. 22-31641-mvl-7
Debtor.	§	
	§	
	§	

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**MOTION FOR SETTING AND REQUEST FOR EXPEDITED HEARING**

John Debus (“Debus”), Joseph Hart IV (“Hart”), Anthony Rao (“Rao”), and Mark Keiffer (“Keiffer,” and collectively with Debus, Hart and Rao, the “Former Officers”), by and through their undersigned counsel, hereby file this motion for an expedited hearing on the *Stipulation and Agreed Order between the Debtor and Former Officers for Limited Relief from the Automatic Stay*

*to Allow for Advancement of Defense Costs Under the Debtor's Insurance Policies* [Docket No. 393] (the "Stipulation and Order"),<sup>1</sup> and respectfully state as follows:

1. As set forth in the Stipulation and Order, if, at the conclusion of the Discussion Period, the Former Officers and the Trustee are unable to resolve the Trustee's objection(s) to the Pre-Stipulation Costs request, then the Parties agree to an expedited hearing to resolve the dispute. Stipulation and Order ¶ 3.E.

2. The Discussion Period has ended, and the Parties are unable to resolve the Trustee's objections.

3. By this motion, the Former Officers respectfully request that the Court set a hearing regarding the dispute and the Stipulation and Order on November 28, 2023.

4. No party will be prejudiced by expedited consideration of this issue.

5. The Former Officers estimate that the expedited hearing regarding the Stipulation and Order shall take no more than one hour.

*[Remainder of page intentionally left blank]*

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<sup>1</sup> Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the Stipulation and Order.

Dated: November 14, 2023  
Dallas, Texas

Respectfully submitted,

ALSTON & BIRD LLP

/s/ Jared M. Slade

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*Counsel for the Former Officers*

**CERTIFICATE OF CONFERENCE**

I certify that, on November 14, 2023, I conferred with counsel regarding the relief requested herein. Counsel for the Trustee consents to the relief requested herein.

/s/ James J. Vincequera  
James J. Vincequera

**CERTIFICATE OF SERVICE**

I certify that on November 14, 2023, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Northern District of Texas, and additionally on the parties listed on the service list, attached hereto as **Exhibit "A,"** via U.S. first class mail, postage prepaid, and/or electronic mail, as appropriate.

/s/ Jared M. Slade  
Jared M. Slade

**Exhibit "A"**  
**Service List**

Federal Insurance Company Capital Center, 251 North Illinois, Suite 1100 Indianapolis, IN 46204-1927	QBE Insurance Corporation Attn: The Claims Manager 55 Water Street New York, NY 10041
QBE Insurance Corporation c/o CT Corporation System 116 Pine Street, Suite 320 Harrisburg, PA 17101	QBE Insurance Corporation Attn: Underwriting 55 Water Street New York, NY 10041
The Hanover Insurance Company P.O. Box 15145 Worcester, MA 01615	The Hanover Insurance Company 440 Lincoln Street Worcester, MA 01653
Attn: Claims Department Chubb Group of Insurance Companies 82 Hopmeadow St. Simsbury, CT 06070-7683	Chubb, Financial Lines Attention: Chief Underwriting Officer 1133 Avenue of the Americas, 32nd Floor New York, NY 10036
Chubb P.O. Box 5105 Scranton, PA 18505-0518	Attn: Chubb Underwriting Department Chubb Group of Insurance Companies 202B Hall's Mill Road Whitehouse Station, NJ 08889
Continental Casualty Company CNA – Claims Reporting P.O. Box 8317 Chicago, IL 60680-8317	Chubb, Financial Lines Attention: Chief Underwriting Officer 1133 Avenue of the Americas, 32nd Floor New York, NY 10036
Melinda S. Nenning Bailey Cavalieri LLC 10 West Broad Street, Suite 2100 Columbus, OH 43215-3422	Open Brokerage Global Specialty Lines CNA Insurance Company 125 Broad Street – 8th Floor New York, NY 10004
Westchester 10 Exchange Place Jersey City, NJ 07302	Westchester 436 Walnut Street P.O. Box 1000 Philadelphia, PA 19106-3703
James Frinzi 3736 Bee Cave Rd., Ste. 1164 Austin, Texas 78746	Joseph Hart IV 3630 40th Ave W Seattle, WA 98199
James Frinzi 10300 Lisa Cove Austin, Texas 78733	James Frinzi 9204 Eddy Cove Austin, TX 78735
John A. Goodman 103 Industrial Loop, Ste. 1100 Fredericksburg, Texas 78624	Jason Davis Jay Hulings Davis & Santos 719 Flores Street San Antonio, Texas 78204

John Goodman 1008 Middle Creek Road Fredericksburg, Texas 78624	Jarom Yates Haynes and Boone, LLP 2323 Victory Avenue, Ste. 700
Goodman MBE Group LP Joseph M Goodman, General Partner 600 N. Loop 1604 E San Antonio, Texas 78232	Goodman MBE Group LLC Joseph Goodman, Member 600 N. Loop 1604 E San Antonio, Texas 78232
James Goodman 103 Tomahawk Trail San Antonio, Texas 78232	Goodman MBE Group LP 37 Old Fredericksburg Rd. Boerne, Texas 78015
James S. Goodman 205 Crest Trail San Antonio, Texas 78232	Matthias Kleinsasser Winstead PC 300 Throckmorton, Ste. 1700 Fort Worth, Texas 76102
Jason Goodman 6613 Autumn Mist Cove Little Elm, Texas 75068	Jason Goodman 234 W. Woodlawn Ave. San Antonio, Texas 78212
Brad Kozma 5897 Willoughby Frisco, Texas 75033	Jennifer Tatum Lee Connor Lee & Shumaker 609 Castle Ridge Road, Ste. 450 Austin, Texas 78746
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Anthony J. Rao 6 Sprucewood Lane Westport, CT 06880	Jennifer Tatum Lee Connor Lee & Shumaker 609 Castle Ridge Road, Ste. 450 Austin, Texas 78746
Scot Brunke 6929 Sperry St. Dallas, Texas 75214	Jake Goodman 103 Tomahawk Trail San Antonio, Texas 78232
United States Trustee 1100 Commerce Street Dallas, TX 75202	Robert DiRico ARC Excess & Surplus, LLC 113 South Service Road P.O. Box 9012 Jericho, New York 11753